

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: GENERIC PHARMACEUTICALS  
PRICING ANTITRUST LITIGATION

MDL 2724  
16-MD-2724

THIS DOCUMENT RELATES TO:

HON. CYNTHIA M. RUGE

*ALL ACTIONS*

**DEFENDANT TEVA PHARMACEUTICALS USA, INC.’S  
MOTION FOR LEAVE TO FILE UNDER SEAL**

Pursuant to Federal Rule of Civil Procedure 5.2(d), Local Rules 5.1.2(7) and 5.1.5, and Pretrial Orders 7, 45, and 53 (ECF Nos. 121, 561, and 697), Defendant Teva Pharmaceuticals USA, Inc. (“Teva”) respectfully moves for an Order granting leave to file under seal its Reply in Further Support of Teva’s Motion for Reconsideration of the Court’s July 13, 2020 Memorandum and Order on Bellwether Selection and the accompanying Appendix A (ECF No. 1622) (“Reply”).

Teva’s Reply is in further support of its Motion for Reconsideration (ECF No. 1578), which was filed under seal (ECF No. 1594) pursuant to its Motion to Seal Teva’s Motion for Reconsideration (ECF No. 1592). Teva requests leave to file its Reply under seal on the same grounds that merited the sealing of Teva’s Motion for Reconsideration. Accordingly, Teva fully incorporates its legal and factual arguments in support of its Motion to Seal (ECF No. 1592) herein and respectfully requests that the Court grant Teva’s narrowly tailored request to file its Reply under seal.

Pursuant to the Court's March 25, 2020 Standing Order<sup>1</sup> and Notice,<sup>2</sup> Teva has submitted an unredacted PDF version of its Reply via email to the Clerk's Office.<sup>3</sup>

Dated: December 9, 2020

Respectfully submitted,

*/s/ Alison Tanchyk*  
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<sup>1</sup> See Standing Order, In re Temp. Closing of the James A. Byrne U.S. Courthouse in Phila., U.S. DIST. CT. E.D. PA. (Mar. 25, 2020), [https://www.paed.uscourts.gov/documents/notices/not\\_resubmit%20hard%20copy%20documents%20electronically.pdf](https://www.paed.uscourts.gov/documents/notices/not_resubmit%20hard%20copy%20documents%20electronically.pdf).

<sup>2</sup> See Notice to Filers of Hard Copy Documents to Resubmit Electronically, U.S. DIST. CT. E.D. PA. (Mar. 25, 2020), [https://www.paed.uscourts.gov/documents/notices/not\\_resubmit%20hard%20copy%20documents%20electronically.pdf](https://www.paed.uscourts.gov/documents/notices/not_resubmit%20hard%20copy%20documents%20electronically.pdf).

<sup>3</sup> Teva has filed a redacted public version of its Reply via the Court's CM/ECF system. See ECF No. 1622.

**CERTIFICATE OF SERVICE**

I hereby certify that on December 9, 2020, I caused a copy of the foregoing Motion for Leave to File Under Seal to be served on counsel of record via the Court's CM/ECF system.

*/s/ Alison Tanchyk*  
Alison Tanchyk